

I urge the Commission to consider the following:

- 1.) ***Several arguments indicate RM-10352 is not necessary because the bandplan works, and a rule would cause a hardship on SSB operators.*** Such arguments, in effect, declare themselves strawman arguments. For operators who follow bandplans (in accordance to good operating practices) an actual rule would have no effect and cause no hardship. RM-10352 would only affect those who intentionally or unintentionally violate IARU and ARRL bandplans, indicating the bandplans do ***NOT*** work effectively.
- 2.) ***Several comments incorrectly indicate or imply this is a weak signal, Morse code, or “contesting” rulemaking request.*** This is not true, and is evidence that the commenter has not carefully read or does not understand the intent of RM-10352. RM-10352 has been carefully constructed to benefit and encourage use of new digital modes and experimentation with narrow modes. Most technical breakthroughs do not come from traditional SSB and Morse communications. RM-10352 sets aside an area where narrow modes of the future can operate without intentional and unintentional interference from wide voice modes.
- 3.) ***Several comments claim this proposal is unfairly prejudiced against SSB operation.*** This clearly is not true. The requested action makes 160-meter’s structuring identical to other bands below 144 MHz, with the exception that 160-meters would have a smaller narrow-mode set aside (as a percentage of available frequency) than 80, 40, 20, and 15 meters. Even the recently added WARC bands have set-asides to protect narrow modes of a much larger percentage than the request for 160 meters.

Sincerely,

Charles T. Rauch